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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12

13 ARNOLD ABRERA,

14 Plaintiff,

15 v.

16 GAVIN NEWSOM, in his official capacity as  
Governor of the State of California;  
17 ROB BONTA, in his official capacity as  
Attorney General of the State of California;  
18 ANNE MARIE SCHUBERT, in her  
official capacity as County of Sacramento  
19 District Attorney; COUNTY OF  
SACRAMENTO; BOBBY DAVIS, in his  
20 official capacity as Chief of the Elk Grove  
Police Department; JONATHAN P.  
21 HOBBS, in his official capacity as the City  
Attorney for the City of Elk Grove; CITY OF  
22 ELK GROVE,

23 Defendants.  
24

Case No. 2:22-cv-01162-JAM-DB

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS CITY OF ELK GROVE,  
BOBBY DAVIS, AND JONATHAN HOBBS  
TO RESPOND TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT; ORDER**

25 IT IS HEREBY STIPULATED by and between Plaintiff ARNOLD ABRERA and  
26 Defendants CITY OF ELK GROVE, BOBBY DAVIS, and JONATHAN HOBBS (together as  
27 ELK GROVE DEFENDANTS) through their respective attorneys that the ELK GROVE  
28 DEFENDANTS may have additional time to answer or otherwise respond to Plaintiff's First

1 Amended Complaint (ECF 16). Therefore, the last day for the ELK GROVE DEFENDANTS to  
2 answer or otherwise respond to Plaintiff's complaint is Thursday, November 16, 2023.

3 Good cause exists for this extension as the Plaintiff and the ELK GROVE DEFENDANTS  
4 have been engaged in settlement discussions and require additional time to explore possible  
5 resolutions to their matter. In addition, the length and complexity of the First Amended Complaint,  
6 which contains 506 paragraphs of allegations, requires additional time to prepare an answer or  
7 other response in the event a resolution is not reached.

8 This document is being electronically filed through the Court's ECF system. In this regard,  
9 counsel for the ELK GROVE DEFENDANTS hereby attests that (1) the content of this documents  
10 is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred  
11 with the filing of this document; and (3) a record supporting this concurrence is available for  
12 inspection or production if so ordered.

13  
14 DATED: October 13, 2023

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
A Professional Corporation

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16  
17 By: /s/ Alec D. Tyra

David W. Tyra

Alec D. Tyra

Attorneys for Defendants City of Elk Grove,  
Bobby Davis, and Jonathan P. Hobbs

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20  
21 DATED: October 13, 2023

LAW OFFICES OF GARY W. GORSKI

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23  
24 By: /s/ Gary W. Gorski

Gary W. Gorski

Attorney for Plaintiff Arnold Abrera

**ORDER**

Pursuant to the parties' stipulation, **IT IS SO ORDERED**. Defendants City of Elk Grove, Bobby Davis, and Jonathan Hobbs should answer or otherwise respond to Plaintiff's First Amended Complaint on or before **Thursday, November 16, 2023**.

Dated: October 13, 2023

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE